Application No.: 10/637,433 Docket No.: MWS-059

REMARKS

In this Response, Applicant amends claims 1, 7, 12 and 23 and cancels claims 6 and 24. Claims 1-5 and 7-23 are currently pending, of which claims 1, 12 and 23 are independent. No new matter has been added.

I. Summary of Claim Rejections

Claim 23 is rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter.

Claims 1-7, 10, 12-17, 21 and 23 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Number 6,957,191 to Belcsak et al (hereafter "Belcsak").

Claims 8-9, 11, 18-20 and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Belcsak in view of United States Patent Number 6,339,838 to Weinman (hereafter "Weinman").

II. Claim Rejections under 35 U.S.C. §101

Claim 23 is rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter (Office Action, paragraph 3). More particularly, the Examiner stated that the claimed computer-program product includes intangible media such as a "propagated signal" because of one implementation discussed in the specification and that the claim was therefore directed to non-statutory subject matter. Applicant respectfully disagrees. Applicant notes that claims 23 and 24 do not recite a propagated signal. Rather, claims 23 and 24 recite "a computer program product *residing on* a *computer readable medium*." Propagated signals do not "reside on" computer readable mediums but rather are propagated between locations. Accordingly, Applicant believes that a computer program product **residing on** a computer readable medium is directed to statutory subject matter. *See* In re Beauregard, 53 F.3d 1583, 1583-84 (Fed. Cir. 1995). As such, Applicant respectfully requests the Examiner to reconsider and to withdraw the 35 U.S.C. §101 rejection of claim 23.

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III.   Claim Rejections under 35 U.S.C. §102(e)

Claims 1-7, 10, 12-17, 21 and 23 is rejected under 35 U.S.C. §102(e) as being anticipated by Belcsak (Office Action, paragraph 5). Applicant respectfully traverses the rejections.

The Belcsak reference discusses a financial scenario modeling and analysis tool which includes a graphical user interface (GUI) which allows a user to create a graphical model of the financial scenario (Belcsak, abstract). The tool also includes an engine to automatically generate information which at least partially models at least a part of the financial scenario using information collection during creation of the graphical model (Belcsak, abstract).

A.   Claim 1

Amended independent claim 1 recites:

> "A method comprising:
>   performing an analysis or synthesis operation on a graphical model representation that includes at least one graphical object;
>   producing a report from the analysis or synthesis operation;
>   generating associations associating elements of the graphical model representation with corresponding elements in the report;
>   receiving a selection of a graphical object in the graphical model representation; and
>   displaying at least one element of the report in response to the selection."

Applicant respectfully submits that Belcsak fails to disclose at least the following elements of amended independent claim 1: "receiving a selection of a graphical object in the graphical model representation," and "displaying at least one element of the report in response to the selection."

The Examiner points to column 9, lines 35-67 in Belcsak as disclosing the generation of associations recited in claim 1 (Office Action, paragraph 5). Column 9, lines 35-67 in Belcsak, discusses a Payment Diagram as the first chapter in the graphical user interface (GUI) of the modeling tool, in which the GUI is organized as a number of tabbed chapters. The cited section of Belcsak further discusses that the Payment Diagram is a graphical representation of a deal and can be controlled and edited (Belcsak, column 9, lines 35-67). For example, the user can rearrange who pays what to whom by moving the instrument arrows from one box to another

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(Belcsak, column 9, lines 35-67). The cited section also discusses displaying detailed information about the instruments and parties in the Payment Diagram (Belcsak, column 9, lines 35-67). For example, the user can view a list of actions appropriate for an instrument or party by clicking on the instrument or party (Belcsak, column 9, lines 35-67). However, contrary to the Examiner's statement regarding claim 1, the cited section does not disclose generating an association associating elements of the graphical model representation with corresponding elements in the report as recited in amended claim 1.

The Examiner points to column 16, lines 16-50 in Belcsak as disclosing a report (Office Action, paragraph 5). Column 16, lines 16-50 in Belcsak discusses reports that allow a user to create, edit, view and print model data. The cited section of Belcsak discusses that a report may consist of different sections or elements (Belcsak, column 9, lines 35-67). However, the cited section does not disclose that a user can select a portion of a financial model (which the Examiner has equated with a graphical model representation) to obtain a display of an element of a report corresponding to the model as recited in the amended claim 1.

Accordingly, for at least the reasons presented above, Applicant respectfully requests reconsideration and allowance of claim 1.

B.   Claims 2-7 and 10

Claims 2-7 and 10 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-7 and 10 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests reconsideration and allowance of claims 2-7 and 10.

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C. Claim 12

Claim 12 as amended recites:

"A system comprising:
means for performing an analysis or synthesis operation on a graphical model representation that includes at least one graphical object;
means for producing a report from the analysis or synthesis operation;
means for generating associations associating elements of the graphical model representation with corresponding elements in the report;
means for receiving a selection of a graphical object in the graphical model representation; and
means for displaying at least one element of the report in response to the selection."

Amended independent claim 12 is a system claim reciting "means for" language corresponding to the language of the amended claim 1. Applicant respectfully submits that Belcsak fails to disclose at least the following features of amended independent claim 12: "means for receiving a selection of a graphical object in the graphical model representation, and "means for displaying at least one element of the report in response to the selection." As noted above, there is no discussion in Belcsak of displaying an element of the report in response to the selection of a graphical object in the graphical model representation.

Accordingly, Applicant respectfully requests reconsideration and allowance of claim 12.

D. Claims 13-17 and 21

Claims 13-17 and 21 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-17 and 21 are allowable for at least the reasons set forth above with respect to claim 12. Applicant respectfully requests reconsideration and allowance of claims 13-17 and 21.

E. Claim 23

Independent claim 23 is a computer program product claim corresponding to claim 1. Applicant respectfully submits the arguments submitted above with respect to claim 1 are equally applicable to claim 23. Accordingly, Applicant requests the allowance of claim 23.

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IV.   Claim Rejections under 35 U.S.C. §103(a)

Claims 8, 9, 11, 18-20 and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Belcsak in view of Weinman (Office Action, paragraph 7). Applicant respectfully traverses the 35 U.S.C. §103(a) rejections of claims 8-9, 11, 18-20 and 22 as set forth below.

The Belcsak reference has been summarized above.

The Weinman reference discusses a commonly shared data repository which maintains a formal model of a process (Weinman, abstract). A plurality of tools allows modeling an existing or proposed process, and analyzing, controlling, modifying and improving the process (Weinman, abstract).

A.   Claims 8, 9 and 11

Claims 8, 9 and 11 depend on claim 1 and teachings of Weinman do not supplement Belcsak in such a way as to cure the shortcomings of Belcsak with respect to the features of independent claim 1. More specifically, Weinman fails to disclose or suggest at least the following feature of claims 8, 9 and 11: "receiving a selection of a graphical object in the graphical model representation," and "displaying at least one element of the report in response to the selection." Since Belcsak does not disclose or suggest this feature, as argued above with respect to claim 1, Weinman does not cure the shortcomings of Belcsak with respect to dependent claims 8, 9 and 11.

Accordingly, for at least the reasons presented above, Belcsak and Weinman, alone or in any reasonable combination, fail to disclose or suggest the features of claims 8, 9 and 11. Therefore, the combination of Belcsak and Weinman does not support a valid 35 U.S.C. §103(a) rejection of claims 8, 9 and 11.

B.   Claims 18-20 and 22

A combination of Belcsak and Weinman does not disclose or suggest the elements of claims 18-20 and 22. As discussed previously in connection with claim 12, Belcsak fails to disclose or suggest the elements of claim 12 from which claims 18-20 and 22 depend. The

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teachings of Weinman do not supplement Belcsak in such a way as to cure the shortcomings of Belcsak with respect to the elements of independent claim 12.

Weinman fails to disclose or suggest at least the following elements of claims 18-20 and 22: "means for receiving a selection of a graphical object in the graphical model representation, and "means for displaying at least one element of the report in response to the selection." Accordingly, for at least the reasons presented above, Belcsak and Weinman, alone or in any reasonable combination, fail to disclose or suggest the features of claims 18-20 and 22. Therefore, the combination of Belcsak and Weinman does not support a valid 35 U.S.C. §103(a) rejection of claims 18-20 and 22.

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CONCLUSION

In light of the above amendments and arguments, Applicant respectfully submits that all of the pending claims are in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-059. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: July 5, 2007   Respectfully submitted,

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